

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

RAMÓN PÉREZ-VALDEZ,
Defendant.

Criminal No. 25-030 (PAD)

SENTENCING MEMORANDUM

TO THE HONORABLE PEDRO A. DELGADO-HERNANDEZ
UNITED STATES DISTRICT JUDGE
FOR DISTRICT OF PUERTO RICO

Mr. Ramón Pérez-Valdez (“Mr. Pérez-Valdez”), a 63-year-old man resident of Santo Domingo, Dominican Republic, respectfully requests the Court sentence him to the time he has served. To support his request, he submits this sentencing memorandum hoping to provide sufficient information to the Court so it can meaningfully exercise its sentencing authority under 18 U.S.C. § 3553(a) under Rule 32(c)(1)(A)(ii).

Mr. Pérez-Valdez had a challenging childhood. His living conditions were dire while he lived with his parents and siblings in a small house made of wood without water or electricity. Mr. Pérez-Valdez remembers the rumbling noises his stomach would make when he was growing up due to starvation. His parents could not afford food for all of his household.

Poverty obligated Mr. Pérez-Valdez to begin working since a young age. He was 12 years old when he started working in agriculture with his father. His father would take him to a field to start cultivating rice. And ever since he was 12, Mr. Pérez-Valdez has known no other thing other than hard work to earn a living and put food on the table.

Mr. Pérez-Valdez had to leave school. Even though he's wanted to become more educated, poverty made working a part of his life far more important than education. His employment offers have always been limited to what he can physically do. Mr. Pérez-Valdez's scarce resources forced him to dive headfirst into these professional ventures. He learned to work in construction, as a mason, gardener and industrial craftsman.

Mr. Pérez-Valdez has lived in Santo Domingo during most of his life until 2025. His life before 2023 was rather stable given his enthusiasm to work on whatever construction project he was offered. But everything changed in 2023 when he was hit by a car and his head impacted a concrete wall. Mr. Pérez-Valdez lost consciousness, suffered serious intracranial bleeding and suffered a traumatic brain injury. He could not speak for days. Because of his accident, Mr. Pérez-Valdez could not work for some time. He was working as a construction worker and could not do physical work. Over a year passed by and Mr. Pérez-Valdez could not secure another employment.

To make matters worse, his mother, 91 years of age, became sick. She was hospitalized and had to receive several blood transfusions. Her diabetes significantly worsened and as a side effect she developed an ulcer in one of her legs that has taken her ability to move. Not knowing how he would pay for his mother's medical treatment, Mr. Pérez-Valdez took out a loan and used his mother's house as collateral.

Out of desperation, Mr. Pérez-Valdez decided to illegally reenter Puerto Rico on January 2025 after a friend offered him a job. He wanted to take up on his friend's offer for at least six (6) months. This will let him make enough money and keep paying for his mother's medical treatment and the loan. The decision to return to Puerto Rico was not taken lightly. It implicated leaving his 91-year-old mother, with whom he lives, in the care

of another person. At least up until he made enough money to return home and continue caring for her.

Mr. Pérez-Valdez confesses that his time on federal detention have taken a considerable toll on his mental wellbeing. He is often overcome by a sense of depression and anxiety. Since he's still recovering from the injuries sustained in 2023, Mr. Pérez-Valdez experiences pain in his chest and extremities. While incarcerated he has lost mobility and finds it hard to walk. Mr. Pérez-Valdez endures constant pain.

Although breaking the law is wrong, Mr. Pérez-Valdez's reason for committing this offense responded to the love for his family, especially his mother whose health condition has worsen requiring specialized care. Mr. Pérez-Valdez vows to never reenter the United States. And, due to his medical conditions at 63 years of age, he certifies he has no energy to come back, nor the monetary resources to do so. Mr. Pérez-Valdez has no desire to ever be arrested again.

After considering the mitigating circumstances above, Mr. Pérez-Valdez moves the Court to impose a sentence of time served. The United States Sentencing Guidelines calculate the base offense level for Count One of the Indictment at eight (8) under USSG § 2L1.2. Since he accepts responsibility for his actions, a two-level reduction is warranted pursuant to USSG § 3E.1.1(a). Mr. Pérez-Valdez also qualifies for a two-level reduction under USSG § 4C1.1(a) and (b). With a Criminal History Category of I, and a total offense level of four (4), Mr. Perez-Valdez's advisory guideline's range of imprisonment is from zero (0) to six (6) months.

The Court should also note that Mr. Pérez-Valdez has been incarcerated since January 17, 2025, and that he will be subject to additional administrative detention while he awaits

removal proceedings. A sentence of time-served would be “sufficient, but not greater than necessary” in light of the totality of the circumstances (18 U.S.C. § 3553(a)).

WHEREFORE, it is respectfully requested that the Court find that with above-mentioned information it can meaningfully exercise its sentencing authority under 18 U.S.C. § 3553(a), and impose a sentence of time served.

I HEREBY CERTIFY that on this date I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system which will send notification of this filing to the parties of record.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico this 19th day of May 2025.

RACHEL BRILL
Federal Public Defender
District of Puerto Rico

S/ Stephanie Torres-Pérez
Stephanie Torres-Pérez
Assistant Federal Public Defender
USDC-PR 308710
241 F.D. Roosevelt Ave.
San Juan, P.R. 00918-2441
T: (787)-281-4922
F: (787)-281-4899